

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

ATLAS DATA PRIVACY  
CORPORATION, et al.,

Plaintiffs,

v.

THOMSON REUTERS  
CORPORATION, et al.,

Defendants.

Civil Action No. 24-04269-HB

**AMENDED STIPULATION AND PROPOSED ORDER REGARDING  
SUBSTITUTION OF PARTIES PURSUANT TO FED. R. CIV. P. 21**

WHEREAS, Plaintiffs filed a Complaint in the Superior Court of New Jersey Law Division, Morris County, against Defendants Thomson Reuters Corporation, Thomson Reuters Canada Limited, Thomson Reuters Holdings Inc. (“TR Holdings”) and Thomson Reuters Applications Inc. (“TR Applications”) (collectively, “Defendants”); and

WHEREAS, on March 27, 2024, Defendants removed the Complaint to this Court pursuant to 28 U.S.C. § 1441(b) and 28 U.S.C. § 1332; and

WHEREAS, on May 3, 2024, Plaintiffs filed their consolidated motion to remand the Complaint; and

WHEREAS, on November 20, 2024, the Court granted Plaintiffs’ motion for remand (“Remand Order”); and

WHEREAS, on December 2, 2024, Defendants filed their motion for reconsideration regarding the Remand Order; and

WHEREAS, the Parties have met and conferred and agree to substitute certain defendants named in the Complaint pursuant to Fed. R. Civ. P. 21, subject to the agreements and provisions set forth below; and

WHEREAS, the substitution of those defendants will not prejudice any party to this action, will not result in any delay of these proceedings, and will serve the interest of judicial efficiency.

IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiffs and Defendants, and subject to the Court's approval, as follows:

1. Plaintiffs agree to withdraw their motion for remand with respect to this action only and hereby move to vacate the Court's Remand Order as it pertains to this case only;
2. Plaintiffs will substitute Thomson Reuters Enterprise Centre GmbH ("TREC"), which is a company incorporated and headquartered in Switzerland (*see* Declaration of Steven Fox, ECF No. 38-1, ¶ 10) and West Publishing Corporation ("West"), which is a company incorporated in Minnesota and with its principal place of business in Minnesota (*id.* at ¶ 13), in place of TR Holdings and TR Applications on the following conditions:

- a. Plaintiffs' claims against defendants TR Holdings and TR Applications are dismissed without prejudice;
  - b. West and TREC are deemed to have been properly served;
  - c. West and TREC are deemed to have joined in the Consolidated Motion to Dismiss filed in the action captioned *Atlas Data Privacy Corporation, et al. v. Lightbox, Parent, L.P., et al.*, Civil Action No. 1:24-cv-4105, including all briefing on that motion, as if they were parties at the time of filing instead of TR Holdings and TR Applications;
  - d. The Court's Order and Memorandum dated November 26, 2024 denying the Consolidated Motion to Dismiss and the Court's Order dated December 2, 2024 certifying the November 26 Order for immediate interlocutory appeal pursuant to 28 U.S.C. § 1292(b) are deemed to have been filed in this case;
  - e. West and TREC are subject to all orders previously entered by the Court in this matter; and
  - f. The Parties reserve all right and defenses available to them.
3. Upon the Court's order approving this stipulation, the case shall proceed as if it had originally been filed against the following

defendants: Thomson Reuters Corporation, Thomson Reuters  
Canada Limited, West and TREC.

IT IS SO STIPULATED ON December 10, 2024, THROUGH  
COUNSEL OF RECORD.

**BY: BALLARD SPAHR LLP**

**BY: PEM LAW LLP**

/s/ Michael Berry  
Marcel S. Pratt  
Michael Berry  
Jordan Meyer  
1735 Market Street, Fl. 51  
Philadelphia, PA 19103-7599  
215.864.8500  
prattm@ballardspahr.com  
berrym@ballardspahr.com  
meyerjl@ballardspahr.com

/s/ Rajiv D. Parikh  
Rajiv D. Parikh  
Kathleen Barnett Einhorn  
One Boland Drive, Suite 101  
West Orange, New Jersey 07052  
Tel: (973) 577-5500  
rparikh@pemplawfirm.com  
keinhorn@pemplawfirm.com

*Attorneys for Plaintiffs*

*Attorneys for Defendants  
Thomson Reuters Holdings Inc.,  
Limited, Thomson Reuters  
Applications Inc., Thomson  
Reuters Enterprise Centre GmbH  
and West Publishing Corporation*

**SO ORDERED**, this \_\_\_\_ day of \_\_\_\_\_, 2024.

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HONORABLE HARVEY BARTLE III  
U.S. DISTRICT COURT FOR DISTRICT OF NEW JERSEY